

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

GLENN WILLIAMS, et al,)	
)	
Plaintiffs,)	
)	Case No: 20 CV 420
v.)	Honorable Virginia Kendall
)	
CITY OF CHICAGO, et al)	
)	
Defendants.)	

PLAINTIFFS' MOTION FOR LEAVE TO FILE AMENDED COMPLAINT, *INSTANTER*

NOW COMES the named and putative class plaintiffs, by and through their attorneys, ALLISON K. MUTH, and ROBERT A. HOLSTEIN of HOLSTEIN & MUTH, LLC, and respectfully moves this Court for Leave to File their Amended Complaint, *Instanter*. In support thereof, the Plaintiffs and putative class plaintiffs state as follows:

- 1.) Plaintiffs' counsel respectfully state that they are well aware of the indulgence of the Court in accepting the Plaintiffs' Amended Complaint, and its consideration of the circumstances that have been visited upon all of the citizens of our nation and the world since the beginning of this year. These circumstances are apparent whereas the professionalism of the investigation and research, although not readily appreciated, along with life issues, have been all consuming for the past two years or more.
- 2.) That the original complaint was timely filed on January 19, 2020. That since that time, plaintiffs' attorneys have vigorously worked on the filing of a well-pleaded amended complaint, with efforts of the upmost professional concerns. That the

circumstances, both professional and personal, outside of the control of the counsels, have lead to multiple challenges.

3.) However, to our knowledge, has the time created any prejudice to any of the parties, both plaintiffs or defendants.

WHEREFORE, named and putative class plaintiffs, respectfully requests that this Honorable Court, grant the Plaintiffs leave to file their Amended Complaint.

Date: the 14th day of August, 2020

Respectfully Submitted,

s/ Robert A. Holstein

One of the Attorneys for Plaintiffs

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CERTIFICATE OF SERVICE

I, Allison K. Muth, attorney for named and putative class plaintiffs, hereby certify that on Friday, August 14, 2020, I filed the above described document(s) on the CM/ECF system of the United States District Court for the Northern District of Illinois, which constates service of the same.

Respectfully Submitted,

s/Allison K. Muth

